

CocoaLife™

For Your Well-Being™

25302 Dallas Parkway Suite 1110
Addison, TX 75001
(214) 442-1390

NOV 22 P2:23

OCT 31 2005

October 21, 2005

Office of Special Nutritional Products, Labeling and Dietary
Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

Re: Notification of Product Claims

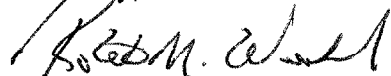
Dear Sir or Madam:

This letter serves as thirty day notification, pursuant to 21 U.S.C. 343(r)(6) (section 403(r)(6) of the Federal Food, Drug and Cosmetic Act), of the nutritional support label statements being made by CocoaLife, LP, located at 15301 Dallas Parkway, Suite 1110, Addison, TX 75001, in connection with the marketing of its CocoaSmart formula. A list of the product ingredients and nutritional support statements are set forth in the attached Exhibit "A."

The undersigned certifies that the information contained in this notice is complete and accurate and that the company maintains documentation to substantiate that its product claims are truthful and not misleading.

If you have any questions, please feel free to contact the undersigned.

Sincerely,



Robert M. Woodard
CocoaLife, LP

97S 0162

LET

16 944

EXHIBIT "A"

Product: CocoaSmart

A dietary supplement containing cocoa extract.

Statements of Nutritional Support:

- Provides all of the cardiovascular benefits associated with dark chocolate without any of the fat, sugar, dairy products, or calories.
- Antioxidants may help prevent or delay damage to the cells and tissues and help combat aging. CocoaSmart has flavanols which are powerful antioxidants believed to have a variety of heart healthy benefits.
- The health benefits of dark chocolate are being widely reported in medical and news journals around the world. Clinical trials and research have shown that dark chocolate is beneficial due to the high cocoa content and the rich concentration of antioxidant compounds found naturally in cocoa.
- Helps maintain blood pressure levels that are already within normal range. Clinical trials at the Jean Mayer USDA Human Nutrition Research Center on Aging at Tufts University in Boston, which were published by the American Heart Association, have shown that consuming one bar of chocolate per day can help maintain healthy blood pressure levels.
- Consuming foods with high antioxidant values is a way to boost the body's defenses to combat free radicals.
- May help boost normal blood flow and cardiovascular health.